



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

October 6, 1986

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MEMORANDUM

SUBJECT: Immediate Removal at 2459 Charlotte Street, Kansas City, Missouri, and Other Satellite Properties Identified in Docket No. 86-F-0015.

FROM: Martha R. Steincamp  
Deputy Regional Counsel

TO: File - Martha C. Rose Docket No. 86-F-0015

A question was raised on whether to use Reidel, our zone contractor, to accomplish the immediate removal of equipment from various properties in Missouri. The issue is that Reidel used to be E.E.S., which was a subsidiary of Reidel International and as E.E.S. sent two transformers to Martha C. Rose. The facts concerning this transaction are as follows:

E.E.S. was a clean-up contractor for Emerson Electric, and as a result of a clean-up, sent 2 transformers to the Martha C. Rose Chemicals, Inc. (MCR) in Holden, Missouri - one contained 15 gallons and the other contained 20 gallons of PCB fluid. The date of the invoice from Martha C. Rose is 3-22-84. The charge was for \$135. It arrived by truck on 3-15-84.

E.E.S. was an operating division of Reidel International. E.E.S. was reorganized and assets of E.E.S. were transferred to a new subsidiary created by Reidel International, Reidel Environmental Services, Inc. (R.E.S.)

Reidel International spun off R.E.S. to a new company, Reidel Environmental Technologies, which now owns Reidel Environmental Services. Reidel Environmental Technologies is a publicly owned corporation.

Based on the de minimis nature of the corporate transactions involving E.E.S., predecessor corporation to R.E.S., it is my opinion that using R.E.S. to accomplish the immediate removal actions is not a conflict of interest in this case. Under CERCLA, E.E.S. would not be considered a responsible party under the circumstances.

FOIA Exemption 4

I obtained information on this issue from George Hess, ENSV, Betty Zeller, Headquarters Project Officer, Roy Tucker, attorney for R.E.S. (AC 503-295-4400) and [REDACTED], Black and Veatch (EPA contractor working on documents pertaining to Martha C. Rose).

cc: Heine Rompage  
Scott Pemberton

cc: John Wicklund  
George Hess



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SUPERFUND RECORDS